

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Holt, et al. v. National Football
League, et al. (Plaintiffs Robert Moore and
Cassandra Moore ONLY)

Court File No. 2:12-cv-04185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS ROBERT
MOORE AND CASSANDRA
MOORE**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Robert Moore and Cassandra Moore only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 12-CV-04185, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Robert Moore and Cassandra Moore.

2. Plaintiffs' counsel filed a short form complaint for Robert Moore and Cassandra Moore on August 20, 2012.

3. Despite the efforts of the undersigned on Plaintiffs' behalf, the NFL Concussion Settlement Claims Administrator informed Zimmerman Reed LLP that Plaintiffs retained separate counsel to represent them in this case.

4. Specifically, on February 4, 2021, the Claims Administrator issued an NFL Representation Notification ("Notice") to Zimmerman Reed LLP stating that Plaintiffs informed the Claims Administrator that they are represented by a different lawyer, and listing Byron Cuthbert and Associates, LLC as the "New Lawyer Requested by Settlement Class Member" (Exhibit A).

5. The Notice provides "seven days to communicate with the Settlement Class Member and come to a resolution" before the Claims Administrator would "update the Class Member's representation in [its] database to the new lawyer above." Zimmerman Reed LLP attempted to contact Plaintiffs, but they did not respond. More than seven days have passed from the Notice date.

6. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully asks this Court for leave to withdraw as counsel for Robert Moore and Cassandra Moore only in Court File No. 2:12-cv-04185-AB.

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Dated: June 22, 2021

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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